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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

10 GROUND GAME LA, a California
11 nonprofit corporation,

12 Plaintiff,

13 v.

14 CERISE CASTLE, an individual;
15 BENJAMIN CAMACHO, an
16 individual; KATJA SCHATTE, an
17 individual; MORGAN KEITH, an
18 individual; KNOCK LA, a California
19 nonprofit corporation,

20 Defendant.

Case No. 2:25-cv-03795-MRA-JDE

**DECLARATION OF CERISE
CASTLE**

Judge: Hon. Monica R. Almadani

1 **DECLARATION OF CERISE CASTLE**

2 I, Cerise Castle, declare as follows:

- 3 1. I am a defendant in this action and make this declaration in support of an
4 application to seal the original summons and file a redacted version.
- 5 2. I am an investigative journalist. In March 2021, I published a series entitled
6 "A Tradition of Violence," which exposed alleged deputy gangs in the LASD.
- 7 3. Since publication, I have been subjected to repeated threats, including specific
8 death threats that reference my partner and dog.
- 9 4. I have been informed that my activity was monitored by members of the Los
10 Angeles County Sheriff's Department. I have reported threats to federal law
11 enforcement.
- 12 5. National and international press freedom organizations have documented the
13 threats and surveillance I have experienced as a result of my reporting.
- 14 6. I believe that public disclosure of my home address would place me at serious
15 risk of physical harm.
- 16 7. I have retained counsel, Almuhtada Smith of ARS Counsel, P.C., and I now
17 use his law office address (515 S. Flower St., 18th Fl, Los Angeles, CA
18 90071) as my designated address for service and filings.
- 19 8. I am prepared to submit supporting materials under seal or for in camera
20 review if requested by the Court.

21 I declare under penalty of perjury under the laws of the United States that the
22 foregoing is true and correct.

23 Executed on July 18, 2025, in Los Angeles, California.

24 By: /s/ Cerise Castle
25 Cerise Castle
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